

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CAUSE NO: EP:12-CR-00849 (18) FM
	§	
FERNANDO ARELLANO ROMERO	§	

MOTION TO APPOINT PRIVATE INVESTIGATOR

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Fernando Arellano Romero, by and through his attorney of record, Luis Gutierrez, and moves this Court to provide for expenses of investigation and in support thereof would show the Court as follows:

I.

Defendant is charged with the offenses of Conspiracy to Import a Controlled Substance, Importation of a Controlled Substance, Conspiracy to Possess a Controlled Substance with Intent to Distribute and Possession with Intent to Distribute a Controlled Substance, among other things.

II.

Defendant is indigent and without funds to retain a private investigator.

III.

In order to properly prepare this case, counsel for Defendant will be required to hire a private investigator to interview numerous witnesses on the Defendant's behalf.

IV.

That due to the serious nature of the allegations herein, it is imperative that Defense Counsel have available adequate funds to secure the service of a private investigator.

V.

The undersigned counsel has consulted with LJ and Associates Legal, a State Licensed Private Investigator, regarding this matter. LJ and Associates Legal has an extensive background in the areas the subject of this case and is willing to assist in the investigation matters, provided they are appointed by this Honorable Court.

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that this Honorable Court authorize reasonable funds in order to permit the Defendant to hire a private investigator to assist him in the investigation and preparation of her defense and that the Court authorize and direct the federal auditor to pay said costs of such services.

Respectfully submitted,

/s/ Luis Gutierrez

LUIS GUTIERREZ

Attorney for Defendant

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State Bar No. 00792319

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July, 2021, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mr. Antonio Franco (antonio.franco@usdoj.gov), Assistant U.S. Attorney, 700 East San Antonio, 2nd Floor, El Paso, Texas 79901.

/s/ Luis Gutierrez

LUIS GUTIERREZ